

McElroy Deutsch

225 Liberty Street
36th Floor
New York, NY 10281
T: 212.483.9490 | F: 212.483.9129
MDMC-LAW.COM

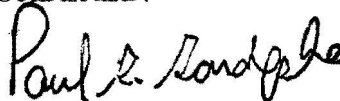
ELIOTT BERMAN
Direct dial: (973) 565-2045
eberman@mdmc-law.com

BY ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

MEMO ENDORSED: The conference scheduled for April 6, 2023 is adjourned to May 4, 2023 at 10:30 a.m. in Courtroom 705 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York. Any amended complaint will be filed by April 12, 2023. If Defendant wishes to pursue a motion to dismiss, it will explain in a letter - submitted by April 19, 2023 - why the amended complaint does not cure the deficiencies identified in Defendant's February 2, 2023 letter. Plaintiff's opposition letter will be due on April 26, 2023.

SO ORDERED.



Re: *Tyler Prince Branch*
Civ. Case

Paul G. Gardephe
United States District Judge

, et al.

Date: April 4, 2023

Dear Judge Gardephe:

This firm represents defendants Caswell-Massey Holdings, LLC ("Caswell Holdings"), Caswell-Massey New York, LLC ("Caswell NY"), and Nicolas Arauz ("Arauz") (collectively, "Defendants") in the above-referenced action commenced by plaintiff Tyler Prince Branch ("Plaintiff"). This letter is written pursuant to Rule 1.6 of Your Honor's Individual Rules of Practice and seeks an adjournment of the Initial Pretrial Conference currently scheduled for April 6, 2023, at 10:00 am.

The reason for the requested adjournment is that I am unavailable on April 6, due to the Passover holiday, which begins on the evening of April 5 (and concludes on Thursday, April 13). Plaintiff does not oppose this request. Counsel for both Plaintiff and Defendants are available on Thursday, April 20 and 27 (as well as on any Thursday in May). Counsel for both parties also request that the joint letter to be submitted seven days in advance of the Initial Pretrial Conference be due seven days in advance of any rescheduled date of that conference.

We thank the Court for its time and consideration to this matter.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ Elliott Berman
Elliott Berman

cc: Counsel of Record (by ECF)